

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**FRED HANEY, MARSHA MERRILL,
SYLVIA RAUSCH, STEPHEN SWENSON,
and ALAN WOOTEN, Individually and on
Behalf of All Others Similarly Situated,**

Plaintiffs,

vs.

**GENWORTH LIFE INSURANCE
COMPANY and GENWORTH LIFE
INSURANCE COMPANY OF NEW
YORK,**

Defendants.

Civil Action No. 3:22-cv-00055-REP

CLASS ACTION

**JOINT MOTION TO APPROVE THE SETTLEMENT WITH
THE LANG OBJECTORS**

Pursuant to Fed. R. Civ. Pro. (“FRCP”) 23(e)(5)(B), Plaintiffs Fred Haney, Marsha Merrill, Sylvia Rausch, Stephen Swenson, and Alan Wooten (“Named Plaintiffs”), on behalf of themselves and the Class (collectively, “Plaintiffs”), Defendants Genworth Life Insurance Company (“GLIC”) and Genworth Life Insurance Company of New York (“GLICNY”) (collectively, GLIC and GLICNY, “Genworth” or “Defendants”), Goldman Scarlato & Penny, P.C., Robbins Geller Rudman & Dowd LLP, Milberg Coleman Bryson Phillips Grossman LLP, and Phelan Petty P.C. (collectively, “Class Counsel”), Objectors Lonny and Carrol Lang (collectively, the “Lang Objectors”), and Blake Weiner Law PLLC and Bandas Law Firm, P.C. (collectively, the “Lang Objectors’ Counsel”) jointly move for an approval of an agreement of settlement reached between Plaintiffs, Defendants, and the Lang Objectors (the “Lang Objectors’ Settlement Agreement”) in the above-captioned Action.

The grounds and reasons for granting this relief are stated with particularity in the accompanying brief and other supporting papers, which are being filed contemporaneously with this Motion under Local Rule 7(F)(1).

[signatures on next page]

DATED: January 30, 2023

Respectfully submitted,

/s/ Jonathan M. Petty (with permission)

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CERTIFICATE OF SERVICE

I certify that on the 30th day of January, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing to all counsel of record.

/s/ Brian E. Pumphrey

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